

MEMO ENDORSED

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff*

RAJ PATEL,

*Intervenor-Plaintiff*

v.

DONALD J. TRUMP, in his personal  
capacity,

*Defendant*

No. 1:20-cv-07311-LAK

*Denied. See Doe v. Trump, No. 19-9936 (LGS), Dkt. 272 (May 26, 2020).*

SO ORDERED

  
LEWIS A. KAPLAN, USDJ

*10/28/2020*

**RAJ PATEL'S (*PRO SE*) MOTION FOR PERMISSIVE INTERVENTION**

I, Raj K. Patel (*pro se*), respectfully move this Southern District Court of New York to grant Fed. R. Civ. P. 24(b)(1)(B) permissive intervention because I “share” with Ms. E. Jane Carroll’s main action a “common” question of law or fact related to defamation, slanderous statements. Fed. R. Civ. P. 24(b)(1)(B); Notice of Removal, *Carroll v. Trump*, No. 1:20-cv-07311-LAK (S.D.N.Y. 20\_\_), Dkt. 1; and 28 U.S.C. § 2674 (“Federal Torts Claims Acts”) (“FTCA”). In addition, I argue that Mr. Trump violated laws of of R.I.C.O., honest services fraud, intellectual property, and the unjust use of a stress weapon (i.e. battery with sound). Art. 17, § 2 of the Universal Declaration of Human Rights (UDHR) of the United Nations; 18 U.S.C. §§ 1961–1968 and 1343–1346; *United States v. Nixon*, 418 U.S. 683 (1974); *see also* Compl. at 131 and 137-160, *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-09936-LGS (S.D.N.Y. \_\_\_\_), Dkt. 1. Motions drafted by *pro se* plaintiffs “are construed liberally and held to a less stringent standard than formal pleadings drafted by lawyers.” *Perez v. Fenoglio*, 792 F.3d 768,